



Reply to Attn of:

October 4, 2007

CC-A

TO: Distribution

FROM: CC/Chief Counsel

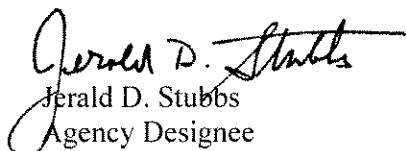
SUBJECT: The National Space Club Florida Committee Space Ball, October 20, 2007

The National Space Club Florida Committee (NSC) will host a Space Ball at the DoubleTree Oceanfront Hotel in Cocoa Beach on Saturday, October 20, 2007. Approximately 250 guests from space-related industries, academia, and state and Federal government are expected to attend. The market value of attendance is \$120 for an attendee and guest.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine there is an Agency interest in having NASA personnel attend this event. This event will provide NASA employees with an opportunity to discuss matters of interest with a diverse group of other guests. Through attendance, employees will be able to disseminate information on NASA's ongoing activities and to demonstrate support for the contributions of the American space industry. Therefore, I find it is in the Government's best interest for invited employees to attend as representatives of NASA.

Further, some invitees have duties as institutional leaders that may substantially affect the NSC. For these invitees, a specific determination under 5 CFR §2635.204(g)(3)(i) is required. In making this determination, I considered the following: (1) the importance of the event to NASA; (2) the nature and sensitivity of pending matters affecting the NSC; (3) the significance of the NASA employees' roles in these matters; (4) the purpose of the event; (5) the identity of other expected participants; and (6) the \$120 market value of the gift of free attendance. I have considered these factors and determined the Agency's interest in these employees' participation in this event outweighs the concern that acceptance of the gift of free attendance may or may appear to improperly influence them in the performance of their official duties.

Finally, NSC's invitation extends to employees and their guests. Because this is an event where attendees will generally be accompanied by a spouse or other guest, employees are authorized to accept free attendance for themselves and their guest.

  
Gerald D. Stubbs  
Agency Designee

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